

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
<p>GENOVA BURNS LLC Daniel M. Stolz, Esq. Donald W. Clarke, Esq. Gregory S. Kinoian, Esq. dstolz@genovaburns.com dclarke@genovaburns.com gtkinoian@genovaburns.com 110 Allen Road, Suite 304 Basking Ridge, NJ 07920 Tel: (973) 467-2700 Fax: (973) 467-8126 <i>Proposed Local Counsel for the Official Committee of Talc Claimants</i></p>	<p>BROWN RUDNICK LLP David J. Molton, Esq. Michael S. Winograd, Esq. Susan Sieger-Grimm, Esq. Kenneth J. Aulet, Esq. dmolton@brownrudnick.com mwinograd@brownrudnick.com ssieger-grimm@brownrudnick.com kaulet@brownrudnick.com Seven Times Square New York, NY 10036 Tel: (212) 209-4800 Fax: (212) 209-4801 And- Jeffrey L. Jonas, Esq. Sunni P. Beville, Esq. Eric R. Goodman, Esq. jjonas@brownrudnick.com sbeville@brownrudnick.com egoodman@brownrudnick.com One Financial Center Boston, MA 02111 Tel: (617) 856-8200 Fax: (617) 856-8201 <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i></p>
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In re:
LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Honorable Michael B. Kaplan

**SUPPLEMENTAL CERTIFICATION OF JEFFREY CARHART IN SUPPORT OF
APPLICATION FOR RETENTION OF MILLER THOMSON LLP AS SPECIAL CANADIAN
COUNSEL FOR THE OFFICIAL COMMITTEE OF TALC CLAIMANTS OF LTL
MANAGEMENT, LLC**

I, Jeffrey Carhart, being of full age, certify as follows:

1. I am a Partner of or associated with the firm of Miller Thomson LLP (“**MT**”). MT is seeking authorization to be retained as Canadian counsel to the Official Committee of Talc Claimants (the “**Committee**”).
2. I submit this supplemental certification (the “**Supplemental Certification**”) to supplement the certification of professional made in the application (the “**Application**”) for entry of an order authorizing and approving the retention and employment of MT as Special (Canadian) Counsel to the Official Committee of Talc Claimants (the “**Committee**”) in the 2023 Chapter 11 case (the “**Chapter 11 Case**”) of LTL Management LLC (the “**Debtor**”), effective as at April 14, 2023.
3. In particular, at the request of the United States Trustee (the “**U.S. Trustee**”), this Supplemental Certification seeks to clarify certain aspects of the Application.

Hourly Rates for Professionals Listed in Application

4. As described in the Application, there is a core group of four professionals at MT who will work regularly on the Chapter 11 Case. Below is the hourly rate for each of these professionals. While there are likely to be instances where MT utilizes other professionals not listed below, we expect the below professionals to complete the vast majority of the required work in the Chapter 11 Case at the hourly rates below.

Biller	Rate/Hour (CAD)
Jeffrey Carhart	\$900.00
Gavin Finlayson	\$975.00
Asim Iqbal	\$700.00
Monica Faheim	\$445.00

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

Percentage of Gross Billings from Current Connections

5. The U.S. Trustee has requested the percentage of gross income MT has received from each of the clients listed at **Schedule "A"** hereto, which are MT's current connections. I am advised that the combined billings of all of the clients listed at Schedule "A" account for approximately 0.065% of the Firm's total billings during the two years prior to the filing of this second Chapter 11 Case.

Duplication of Services and Markup

6. I hereby certify that MT will use its best efforts to avoid duplication of services provided by any of the Committee's other retained professionals in this case.
7. I hereby certify that MT shall not charge a markup with respect to fees billed by contract attorneys or independent contractors or subcontractors who are hired by MT to provide services in this matter and shall ensure that any such contract attorneys or independent contractors or subcontractors are subject to conflict checks and disclosures in accordance with the requirements of the Bankruptcy Code and Bankruptcy Rules.

The following information is provided pursuant to paragraph D.1. of the U.S. Trustee Guidelines:

8. MT will comply with the United States Trustee's Fee Guidelines in connection with this engagement and has not agreed to variations from standard customary billing arrangements.
9. None of the professionals included in this engagement vary their rate based on the geographic location of the bankruptcy case.
10. The Committee has approved MT's general staffing plan, which is described in the Application and the Original Certification.
11. The Committee has approved MT's proposed budget for the period from April 14, 2023 – July 31, 2023, which was described in a separate letter from MT to the Committee.

I certify under penalty of perjury that the above information is true.

Date June 5, 2023

/s/ Jeffrey Carhart

Signature of Professional

SCHEDULE A

- 1) Bank of America
- 2) Liberty Mutual Insurance Company
- 3) Chubb
- 4) A.O. Smith Corporation
- 5) Colgate-Palmolive Company
- 6) Costco Wholesale Corporation
- 7) Coty Inc.
- 8) Crane Co
- 9) Estee Lauder Inc.
- 10) Fort Motor Company
- 11) Goodyear Tire & Rubber Co.
- 12) Honeywell International Inc.
- 13) Imerys Talc Canada
- 14) Jones Day
- 15) Kolmar Laboratories
- 16) L'Oreal Inc.
- 17) Mary Kay Inc.
- 18) Pfizer Inc.
- 19) Shook, Hardy & Bacon L.L.P.
- 20) The Dow Chemical Company
- 21) The Procter & Gamble Company
- 22) Union Carbide Corporation
Viacom CBS, Inc.
- 23) Walmart, Inc